

Little, Shauna

From: DiMattei, Steve
Sent: Monday, April 23, 2018 4:05 PM
To: Little, Shauna
Subject: RE: RGP group I PAHs

Thanks!

From: Little, Shauna
Sent: Monday, April 23, 2018 4:00 PM
To: DiMattei, Steve <DiMattei.Steve@epa.gov>
Subject: RE: RGP group I PAHs

Technically any method in 40 CFR Part 136 is allowed- 525.2, 610, 625 and 1625 are the methods for which MLs were identified, for reference purposes. We tried to include the most common test methods in the reference tables, but it is not comprehensive. The RGP only specifies individual MLs for a handful of parameters, but not individual test methods. The RGP only specifically prohibits 8260, 8270, MA EPH and MA VPH, as they are the most common incorrect test methods we've seen.

Regards,
Shauna

From: DiMattei, Steve
Sent: Monday, April 23, 2018 3:49 PM
To: [REDACTED] <[REDACTED]@[REDACTED].com>; Little, Shauna <Little.Shauna@epa.gov>
Cc: [REDACTED] <[REDACTED]@[REDACTED].com>
Subject: RE: RGP group I PAHs

[REDACTED],

As noted on page 5 of 7 in Appendix VII of the RGP (see the link below), **only EPA Methods 525.2, 610, 625, and 1625 are allowed for the RGP group 1 PAHs.**

<https://www3.epa.gov/region1/npdes/remediation/FinalAppendixVII.pdf>

Footnote 9 "Test methods 8260 and 8270 cannot be used for the purposes of analysis under this general permit unless approved for use in accordance with 40 CFR Part 136.5. Specific preparation methods may be required."

I am not aware of this information (40 CFR Part 136.5) being submitted to myself or the previous Region 1 ATP Coordinator by [REDACTED]. If you do believe it was submitted, please let me know.

Thanks,

Stephen DiMattei
USEPA Region 1 – OEME/EQA
Regional Laboratory Certification Program Manager/
Regional ATP Coordinator
11 Technology Drive
N. Chelmsford, MA 01863

Phone: 617-918-8369

Fax: 617-918-8269

From: [REDACTED] Ex. 4 - CBI [REDACTED].com]
Sent: Monday, April 23, 2018 2:49 PM
To: Little, Shauna <Little.Shauna@epa.gov>
Cc: [REDACTED] Ex. 4 - CBI [REDACTED].com>; DiMattei, Steve <DiMattei.Steve@epa.gov>
Subject: RE: RGP group I PAHs

Thanks Shauna.

Steve, please let me know if the 8270 SIM will be acceptable for the group 1 PAHs and pentachlorophenol.

Thank-you,

[REDACTED] Ex. 4 - CBI [REDACTED]

From: Little, Shauna <Little.Shauna@epa.gov>
Sent: Monday, April 23, 2018 2:43 PM
To: [REDACTED] Ex. 4 - CBI [REDACTED].com>
Cc: [REDACTED] Ex. 4 - CBI [REDACTED].com>; DiMattei, Steve <DiMattei.Steve@epa.gov>
Subject: RE: RGP group I PAHs

Hi [REDACTED],

I am not able to authorize use of an alternate test procedure. To use SW8270 in lieu of the available test methods in 40 CFR Part 136, which are the test methods required in the RGP, you can request ATP approval from Region I's lab, likely for either specific analytes, or for the RGP specifically. Steve DiMattei is the ATP coordinator and I've copied him on this message.

Regards,

Shauna Little
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5 Post Office Square, Suite 100/OEP06-1
Boston, Massachusetts 02109-3912
Phone (617)918-1989

From: [REDACTED] Ex. 4 - CBI [REDACTED].com]
Sent: Monday, April 23, 2018 2:21 PM
To: Little, Shauna <Little.Shauna@epa.gov>
Cc: [REDACTED] Ex. 4 - CBI [REDACTED].com>
Subject: RGP group I PAHs

Hi Shauna-

I just wanted to get some clarification concerning the RGP group I PAHs and pentachlorophenol. On April 12th 2017, I contacted you concerning the group I PAHs and PCP. The detection limits required a SIM analysis so I called you to discuss if we could use method 8270 SIM as our lab does not run 625 SIM.

You told me that it would be acceptable for those analytes only as we weren't capable of running by 625SIM. One of our clients is questioning this and, since I contacted you via phone, I don't have anything in writing to forward to our client. Would you let me know if the 8270 SIM is acceptable for the group I PAHs and PCP?

I attached an e-mail I sent to you prior to our phone call. There are a couple of notes that were mistakenly written on the attached e-mail and have nothing to do with the RGP questions.

Thanks very much,



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